

WILMERHALE

December 21, 2018

Karin Dryhurst

**Via ECF**

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The Honorable Robert D. Mariani  
U.S. District Court, Middle District of Pennsylvania  
William J. Nealon Federal Building & U.S. Courthouse  
235 North Washington Avenue  
Scranton, PA 18503

Re: *CFPB v. Navient Corp. et al.*, No. 3:CV-17-00101 (M.D. Pa.)

Dear Judge Mariani:

Defendants write to inform the Court that the parties have agreed that Defendants should be permitted to take additional depositions beyond the 30 previously granted by the Court and to seek an order to that effect.

The Court ordered on May 3, 2018 that each party would be permitted to take up to 30 depositions. To date, Defendants have taken 29 depositions. Other depositions have been noticed. On December 5, 2018, the CFPB amended its Rule 26(a)(1) disclosures to add five additional witnesses, and the CFPB has indicated that it may supplement or amend its disclosures in the future to add more witnesses. The parties conferred, and the CFPB consented to Defendants depositing these additional witnesses, even though that would exceed 30 depositions.

Defendants have attached a proposed order permitting them to depose the five witnesses identified by the CFPB on December 5 and any witnesses the CFPB adds to its disclosures in the future.

Respectfully submitted,

A handwritten signature in black ink, appearing to be 'K. Dryhurst', with a long horizontal line extending to the right.

Karin Dryhurst